

MAR 28 2022

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA) **UNDER SEAL**
v.) NO. 3:21-cr-00158

) 18 U.S.C. § 371
[1] BRANDON MILLER) 18 U.S.C. § 922(a)(1)(A)
) 18 U.S.C. § 922(a)(3)
[2] JARIUS BRUNSON) 18 U.S.C. § 922(a)(5)
) 18 U.S.C. § 922(a)(6)
[3] DEMARCUS ADAMS) 18 U.S.C. § 923(a)
) 18 U.S.C. § 924
[4] BLAISE SMITH) 18 U.S.C. § 924(o)
) 18 U.S.C. § 1956(h)
[5] RAHEEM JOHNSON)
)
[6] BRYANT LARKIN)
)
[7] COREY CURTIS)
)
[8] ELIJAH TILLMAN)
)
[9] TERRELL MITCHELL)
)
[10] LAZARUS GREENWOOD)
)
[11] DWIGHT LOWRY)
)
[12] DRESHION PARKS)



DEPUTY CLERK

S U P E R S E D I N G I N D I C T M E N T

COUNT ONE

(Conspiracy to Commit Offenses Against the United States—18 U.S.C. § 371)

THE GRAND JURY CHARGES:

PURPOSE OF THE CONSPIRACY

1. Beginning not later than December 2020, the exact date being unknown to the Grand Jury, through on or about April 28, 2021, in the Middle District of Tennessee and elsewhere,

[1] BRANDON MILLER, [2] JARIUS BRUNSON, [3] DEMARCUS ADAMS, [4] BLAISE SMITH, [5] RAHEEM JOHNSON, [6] BRYANT LARKIN, [7] COREY CURTIS, [8] ELIJAH TILLMAN, [9] TERRELL MITCHELL, [10] LAZARUS GREENWOOD, [11] DWIGHT LOWRY, and [12] DRESHION PARKS did knowingly combine, conspire, confederate, and agree with each other and others known and unknown to the Grand Jury, including KHALIEF WHITFIELD, now deceased, and DONTAE THOMAS, now deceased, to commit certain offenses against the United States, that is:

- A. To knowingly engage in the business of dealing in firearms without a license and in the course of such business, to ship and transport any firearm in interstate commerce, in violation of Title 18, United States Code, Section 922(a)(1)(A);
- B. To willfully transport firearms into another state or receive firearms that the defendant knows were purchased or otherwise obtained outside that state, in violation of Title 18, United States Code, Section 922(a)(3);
- C. To knowingly transfer, sell, trade, give, transport, or deliver any firearm to any person who the transferor knows or has reasonable cause to believe does not reside in the State in which the transferor resides, in violation of Title 18, United States Code, Section 922(a)(5); and
- D. To knowingly make a false and fictitious statement, which statement was intended and likely to deceive federally licensed firearms dealers into believing that the person completing the ATF Form 4473 was the actual transferee/buyer of the firearm when, in fact, the firearm was being purchased for someone else, in violation of Title 18, United States Code, Section 922(a)(6).

MANNER AND MEANS

2. It was part of the conspiracy that [1] **BRANDON MILLER** would purchase firearms from Federal Firearm Licensees (“FFL”), licensed under Chapter 44 of Title 18, United States Code.

3. It was further part of the conspiracy that [1] **BRANDON MILLER** directed [2] **JARIUS BRUNSON**, [3] **DEMARCUS ADAMS**, and others known and unknown to the Grand Jury, to purchase firearms from FFLs, licensed under Chapter 44 of Title 18, United States Code.

4. It was further part of the conspiracy that in order to avoid detection, [1] **BRANDON MILLER**, [2] **JARIUS BRUNSON**, and [3] **DEMARCUS ADAMS** would purchase firearms by falsely claiming on ATF Form 4473, the required Firearms Transaction Record, that they were the buyers and transferees of the firearms, when in fact others known and unknown to the Grand Jury, including [4] **BLAISE SMITH**, [5] **RAHEEM JOHNSON**, [6] **BRYANT LARKIN**, [7] **COREY CURTIS**, [8] **ELIJAH TILLMAN**, [9] **TERRELL MITCHELL**, [10] **LAZARUS GREENWOOD**, [11] **DWIGHT LOWRY**, [12] **DRESHION PARKS**, **KHALIEF WHITFIELD**, now deceased, and **DONTAE THOMAS**, now deceased, and others known and unknown to the Grand Jury were the true buyers and transferees of the firearms.

5. It was further part of the conspiracy that members of the Pocket Town Gangster Disciples, a street gang in Chicago, Illinois, including [4] **BLAISE SMITH**, [5] **RAHEEM JOHNSON**, [6] **BRYANT LARKIN**, [7] **COREY CURTIS**, [8] **ELIJAH TILLMAN**, [9] **TERRELL MITCHELL**, [10] **LAZARUS GREENWOOD**, [11] **DWIGHT LOWRY**, [12] **DRESHION PARKS**, **KHALIEF WHITFIELD**, now deceased, **DONTAE THOMAS**, now deceased, and others known and unknown to the Grand Jury would contact [1] **BRANDON MILLER** and place orders for firearms.

6. It was further part of the conspiracy that [4] BLAISE SMITH, [5] RAHEEM JOHNSON, [6] BRYANT LARKIN, [7] COREY CURTIS, [8] ELIJAH TILLMAN, [9] TERRELL MITCHELL, [10] LAZARUS GREENWOOD, [11] DWIGHT LOWRY, [12] DRESHION PARKS, KHALIEF WHITFIELD, now deceased, DONTAE THOMAS, now deceased, and others known and unknown to the Grand Jury would pay [1] BRANDON MILLER for the firearms by transferring money using various methods, including web-based applications such as CashApp and Zelle and electronic bank transfers, to [1] BRANDON MILLER or others, including [2] JARIUS BRUNSON and [3] DEMARCUS ADAMS at [1] BRANDON MILLER's direction.

7. It was further part of the conspiracy that [1] BRANDON MILLER, [2] JARIUS BRUNSON, [3] DEMARCUS ADAMS, and others known and unknown to the Grand Jury, would purchase firearms for subsequent transfer to members of the Pocket Town Gangster Disciples in Chicago, Illinois, including [4] BLAISE SMITH, [5] RAHEEM JOHNSON, [6] BRYANT LARKIN, [7] COREY CURTIS, [8] ELIJAH TILLMAN, [9] TERRELL MITCHELL, [10] LAZARUS GREENWOOD, [11] DWIGHT LOWRY, [12] DRESHION PARKS, KHALIEF WHITFIELD, now deceased, and DONTAE THOMAS, now deceased.

8. It was further part of the conspiracy that in order to cover the cost of purchasing the firearms, [1] BRANDON MILLER would provide money to [2] JARIUS BRUNSON, [3] DEMARCUS ADAMS, and others known and unknown to the Grand Jury, either in advance of the purchase or as a reimbursement after the purchase of the firearms.

9. It was further part of the conspiracy that [1] BRANDON MILLER, [2] JARIUS BRUNSON, [3] DEMARCUS ADAMS, and others known and unknown to the Grand Jury, then transferred, sold, traded, gave, transported, and delivered these firearms to individuals who resided outside of the States of Tennessee and Kentucky, including in Chicago, Illinois.

10. It was further part of the conspiracy that [4] BLAISE SMITH, [5] RAHEEM JOHNSON, [6] BRYANT LARKIN, [7] COREY CURTIS, [8] ELIJAH TILLMAN, [9] TERRELL MITCHELL, [10] LAZARUS GREENWOOD, [11] DWIGHT LOWRY, [12] DRESHION PARKS, KHALIEF WHITFIELD, now deceased, DONTAE THOMAS, now deceased, and others known and unknown to the Grand Jury, would receive firearms in Illinois, the state in which those defendants resided, that they had purchased or otherwise obtained from outside of Illinois.

OVERT ACTS

11. In furtherance of the conspiracy, and to accomplish its object and purpose, at least one co-conspirator committed and caused to be committed, in the Middle District of Tennessee and elsewhere, at least one of the following overt acts, among others:

A. Beginning not later than December 2020, the exact date being unknown to the Grand Jury, through on or about April 28, 2021, in the Middle District of Tennessee and elsewhere, [1] BRANDON MILLER, who at the time was a soldier in the United States Army and stationed at Fort Campbell, Kentucky, began coordinating the purchase of firearms in Tennessee and Kentucky for delivery to his associates in Chicago. [1] BRANDON MILLER's associates in Chicago, including [4] BLAISE SMITH, [5] RAHEEM JOHNSON, [6] BRYANT LARKIN, [7] COREY CURTIS, [8] ELIJAH TILLMAN, [9] TERRELL MITCHELL, [10] LAZARUS GREENWOOD, [11] DWIGHT LOWRY, [12] DRESHION PARKS, KHALIEF WHITFIELD, now deceased, and DONTAE THOMAS, now deceased, are all members of the Gangster Disciples street gang in the Pocket Town neighborhood of Chicago.

B. [1] BRANDON MILLER recruited two fellow soldiers, [2] JARIUS BRUNSON, [3] DEMARCUS ADAMS, as well as other individuals to purchase firearms

to fulfill the demand for firearms of his associates in Chicago. [1] BRANDON MILLER regularly communicated with his associates in Chicago, including [4] BLAISE SMITH, [5] RAHEEM JOHNSON, [6] BRYANT LARKIN, [7] COREY CURTIS, [8] ELIJAH TILLMAN, [9] TERRELL MITCHELL, [10] LAZARUS GREENWOOD, [11] DWIGHT LOWRY, [12] DRESHION PARKS, KHALIEF WHITFIELD, now deceased, and DONTAE THOMAS, now deceased, regarding the firearms they wished to purchase, the delivery of firearms from the Middle District of Tennessee and elsewhere to Chicago, and disputes between the Pocket Town Gangster Disciples and their rival gangs.

C. On or about December 10, 2020, [1] BRANDON MILLER contacted [11] DWIGHT LOWRY via text message and advised that he would charge \$550 for the two firearms pictured in the text message and [11] DWIGHT LOWRY responded, "Ok can you get them to hold it until Friday? I gotta get my bread up." [1] BRANDON MILLER responded, "Yeah I'll buy em and hold em for u g";

D. On or about December 10, 2020, [1] BRANDON MILLER contacted [11] DWIGHT LOWRY via text message and stated, "the silver one a 380 u still want it it's a steal" and [11] DWIGHT LOWRY responded, "Yup can't beat it";

E. On or about December 18, 2020, [1] BRANDON MILLER contacted [10] LAZARUS GREENWOOD via text message and asked, "U still want these guns," and [10] LAZARUS GREENWOOD responded, "Yeah I only want this one tho" and then sent a picture of the specific gun he wanted to purchase from [1] BRANDON MILLER;

F. On or about December 27, 2020, [1] BRANDON MILLER contacted [10] LAZARUS GREENWOOD via text message and coordinated the delivery of firearms that [1] BRANDON MILLER transported from the Middle District of Tennessee to the Chicago area;

G. On or about December 28, 2020, [3] **DEMARCUS ADAMS**, at the direction of [1] **BRANDON MILLER**, purchased a firearm, to wit: a Glock 17, 9mm pistol, Serial Number BRWA198, from Tennessee Gun Country, a FFL, located in Clarksville, Tennessee, and subsequently transferred, sold, traded, gave, transported, and delivered, through [1] **BRANDON MILLER**, said firearm to an individual residing outside the States of Tennessee and Kentucky;

H. On or about January 4, 2021, [1] **BRANDON MILLER** purchased a firearm, to wit: a Glock 23, .40 caliber Pistol, Serial Number AEKW006, from Gun & Knife Country, a FFL, located in Oak Grove, Kentucky, and subsequently transferred, sold, traded, gave, transported, and delivered said firearm to an individual residing outside the States of Tennessee and Kentucky;

I. On or about January 6, 2021, [5] **RAHEEM JOHNSON** transferred \$500 to [1] **BRANDON MILLER** via CashApp;

J. On or about January 6, 2021, [2] **JARIUS BRUNSON** purchased a Springfield Armory XD MOD 2 .40 caliber pistol bearing serial number BY465572 from Gun & Knife Country, a FFL, in Oak Grove, Kentucky, at the direction of [1] **BRANDON MILLER**;

K. On or about January 8, 2021, [2] **JARIUS BRUNSON**, at the direction of [1] **BRANDON MILLER**, purchased a firearm, to wit: a Glock 27, .40 caliber Pistol, Serial Number BPCF675, from Glory Guns and Pawn, a FFL, located in Oak Grove, Kentucky, and subsequently transferred, sold, traded, gave, transported, and delivered, through [1] **BRANDON MILLER**, said firearm to an individual residing outside the States of Tennessee and Kentucky;

L. On or about January 8, 2021, [12] **DRESHION PARKS** contacted [1]

BRANDON MILLER regarding his desire to purchase a firearm. [1] **BRANDON MILLER** told [12] **DRESHION PARKS** that he possessed firearms that he would sell to [12] **DRESHION PARKS** for \$800;

M. On or about January 10, 2021, [1] **BRANDON MILLER**, [2] **JARIUS BRUNSON**, and [3] **DEMARCUS ADAMS** traveled from the Middle District of Tennessee to the greater Chicago area to deliver firearms they purchased in Kentucky and Tennessee to members of the Pocket Town Gangster Disciples in Chicago, Illinois, including [4] **BLAISE SMITH**, [5] **RAHEEM JOHNSON**, [6] **BRYANT LARKIN**, [7] **COREY CURTIS**, [8] **ELIJAH TILLMAN**, [9] **TERRELL MITCHELL**, [10] **LAZARUS GREENWOOD**, [11] **DWIGHT LOWRY**, [12] **DRESHION PARKS**, **KHALIEF WHITFIELD**, now deceased, **DONTAE THOMAS**, now deceased, and others known and unknown to the Grand Jury;

N. On or about January 11, 2021, [1] **BRANDON MILLER** made automated teller machine (commonly known as an ATM) cash deposits of \$2,560, \$600, \$600, \$250, and \$2,200 into a bank account he controlled;

O. On or about January 15, 2021, [4] **BLAISE SMITH** contacted [1] **BRANDON MILLER** regarding his desire to purchase a firearm. [1] **BRANDON MILLER** told [4] **BLAISE SMITH** that he possessed a Glock 43x with a drum magazine that he would sell to [4] **BLAISE SMITH** for \$850;

P. On or about January 16, 2021, [1] **BRANDON MILLER** sent [7] **COREY CURTIS** pictures of three firearms and stated that the price of one firearm was \$820. [7] **COREY CURTIS** told [1] **BRANDON MILLER** that he was short money and needed to gather an additional \$200 before he could purchase the firearm;

Q. On or about January 17, 2021, [7] **COREY CURTIS** contacted [1]

BRANDON MILLER regarding his purchase of a Glock 19 handgun. [1] **BRANDON MILLER** responded that the purchase price for the firearm was \$875, which [7] **COREY CURTIS** agreed to and requested the approximate delivery date of the firearm from [1] **BRANDON MILLER**;

R. On or about January 20, 2021, [1] **BRANDON MILLER** purchased a firearm, to wit: a Glock 21, .45 caliber Pistol, Serial Number AERW263, from Gun & Knife Country, a FFL, located in Oak Grove, Kentucky, and subsequently transferred, sold, traded, gave, transported, and delivered said firearm to an individual residing outside the States of Tennessee and Kentucky;

S. On or about January 21, 2021, [5] **RAHEEM JOHNSON** contacted [1] **BRANDON MILLER** regarding his desire to purchase a firearm. [1] **BRANDON MILLER** told [5] **RAHEEM JOHNSON** that he possessed firearms manufactured by Springfield Armory (“xds”), firearms manufactured by Glock, and 1,000 rounds of 9mm ammunition available for [5] **RAHEEM JOHNSON** to purchase;

T. On or about January 21, 2021, [1] **BRANDON MILLER** contacted [11] **DWIGHT LOWRY** regarding whether he wanted to acquire additional firearms. [11] **DWIGHT LOWRY** responded, “Nah I’m happy with what I got. Only got the glock 23 glock 20 1911 .45 a .357 and the AR rn”;

U. On or about January 21, 2021, [1] **BRANDON MILLER** contacted [11] **DWIGHT LOWRY** and asked, “U ain’t got the 30 nomo or the xd,” referring to two previously supplied firearms, to which [11] **DWIGHT LOWRY** responded, “Oh yeah I still got the xd nope I gave the 30 to Arthur”;

V. On or about January 21, 2021, [1] **BRANDON MILLER** and [11] **DWIGHT LOWRY** discussed the large numbers of firearms provided by [1] **BRANDON**

MILLER to individuals known to both of them. [1] **BRANDON MILLER** stated that he has provided “40some” firearms, to which [11] **DWIGHT LOWRY** responded, “That’s what’s up! I hope they use em to protect themselves and each other and not just show off for videos. I’m tired of all the death”;

W. On or about January 22, 2021, [2] **JARIUS BRUNSON**, at the direction of [1] **BRANDON MILLER**, purchased a firearm, to wit: a Glock 17, 9mm Pistol, Serial Number BRDK220, from Fort Campbell Main Exchange, a FFL, located on the Fort Campbell military installation in Kentucky, and subsequently transferred, sold, traded, gave, transported, and delivered, through [1] **BRANDON MILLER**, said firearm to an individual residing outside the States of Tennessee and Kentucky;

X. On or about January 24, 2021, [7] **COREY CURTIS** shared his address with [1] **BRANDON MILLER** to facilitate the delivery of the Glock 19 handgun. [1] **BRANDON MILLER** responded that he arrived at the address provided by [7] **COREY CURTIS**;

Y. On or about January 25, 2021, [6] **BRYANT LARKIN** made two money transfers via the Zelle banking application to [1] **BRANDON MILLER** for \$1,000 and \$800;

Z. On or about January 26, 2021, [4] **BLAISE SMITH** contacted [1] **BRANDON MILLER** regarding his desire to purchase a firearm. [4] **BLAISE SMITH** ordered two Glock handguns from [1] **BRANDON MILLER**, which [1] **BRANDON MILLER** advised would cost \$1,700;

AA. On or about February 11, 2021, [1] **BRANDON MILLER** contacted [11] **DWIGHT LOWRY** via text message and asked “[y]ou good on rods.” [11] **DWIGHT LOWRY** responded, “I think my homie want something I’m at work I’ll call you when I

get off.” [1] **BRANDON MILLER** responded, “I’m sitting on a decent amount of em I’m fina get some new shit clearing space.” [11] **DWIGHT LOWRY** asked, “What u tryna get rid of and how much,” to which [1] **BRANDON MILLER** responded, “I got Glock 17 19 43 and big glocks for you 725 a pop wit eggs but anybody else I need 8 without eggs,” and later advised that [11] **DWIGHT LOWRY** would “get all the bells and whistles they jus getting plain Jane”;

BB. On or about February 12, 2021, [1] **BRANDON MILLER** purchased a firearm, to wit: a Glock 43X, 9mm Pistol, Serial Number BSDN847, from Gun & Knife Country, a FFL, located in Oak Grove, Kentucky, and subsequently transferred, sold, traded, gave, transported, and delivered said firearm to an individual residing outside the States of Tennessee and Kentucky;

CC. On or about February 12, 2021, [1] **BRANDON MILLER** purchased a firearm, to wit: a Glock 27Gen5 bearing serial number BPAK426, from Gun & Knife Country, a FFL, located in Oak Grove, Kentucky;

DD. On or about February 12, 2021, [1] **BRANDON MILLER** provided [9] **TERRELL MITCHELL** with his CashApp username via text message to facilitate the transfer of money from individuals in Chicago to [1] **BRANDON MILLER** for the purchase of firearms. [1] **BRANDON MILLER** then messaged [9] **TERRELL MITCHELL** and stated, “jus[t] got it and I’ll grab the rest w[h]en I slide up there blood” and indicated that he would be in Chicago the following weekend;

EE. On or about February 13, 2021, [8] **ELIJAH TILLMAN** requested to purchase a Glock 27Gen5 from [1] **BRANDON MILLER**, coordinated how he would pay [1] **BRANDON MILLER** for the requested firearm, and discussed the purchase of ammunition from [1] **BRANDON MILLER** via text message;

FF. On or about February 20, 2021, [1] **BRANDON MILLER** asked [9] **TERRELL MITCHELL** for his address in Chicago to facilitate the delivery of firearms and then alerted him when he arrived at [9] **TERRELL MITCHELL**'s address;

GG. On or about February 20, 2021, [9] **TERRELL MITCHELL** sent \$300 to [1] **BRANDON MILLER** via CashApp. [1] **BRANDON MILLER** responded that he was “fina [fixing to] hit the road about five dere around 2”;

HH. On or about February 20, 2021, [6] **BRYANT LARKIN** transferred \$900 to [2] **JARIUS BRUNSON** via CashApp as payment for a firearm;

II. On or about February 20, 2021, [8] **ELIJAH TILLMAN** contacted [1] **BRANDON MILLER**, who had travelled to Chicago from the Middle District of Tennessee, to coordinate the delivery of a firearm;

JJ. On or about February 23, 2021, KHALIEF WHITFIELD, now deceased, made two money transfers via the Zelle banking application to [1] **BRANDON MILLER** for \$1,000 and \$2,200;

KK. On or about February 24, 2021, [1] **BRANDON MILLER** transferred \$1,500 to [2] **JARIUS BRUNSON** via CashApp and [2] **JARIUS BRUNSON** used that money to purchase a Glock 27 Gen5, Serial Number BPAK427, from Gun & Knife Country, a FFL, located in Oak Grove, Kentucky;

LL. On or about February 25, 2021, KHALIEF WHITFIELD, now deceased, transferred \$900 via the Zelle banking application to [1] **BRANDON MILLER**;

MM. On or about February 26, 2021, [2] **JARIUS BRUNSON** purchased a Brigade BM 9mm handgun, Serial Number 18003F, and a Glock 35 Gen4 .40 mm handgun, Serial Number ACHD780, from Gun & Knife Country, a FFL, located in Oak Grove, Kentucky;

NN. On or about March 1, 2021, [4] **BLAISE SMITH** contacted [1] **BRANDON MILLER** to purchase two additional Glock handguns, which [1] **BRANDON MILLER** told [4] **BLAISE SMITH** would cost \$1,650;

OO. On or about March 1, 2021, [12] **DRESHION PARKS** contacted [1] **BRANDON MILLER** regarding his desire to purchase a Glock firearm. [1] **BRANDON MILLER** told [12] **DRESHION PARKS** that he possessed a Glock firearm that he would sell to [12] **DRESHION PARKS**;

PP. On or about March 2, 2021, [5] **RAHEEM JOHNSON** contacted [1] **BRANDON MILLER** regarding his desire to purchase a firearm. [5] **RAHEEM JOHNSON** told [1] **BRANDON MILLER** that he had \$600 to purchase a firearm and that he “aint tryna [to] miss the last shipment” of firearms [1] **BRANDON MILLER** was scheduled to bring to Chicago in early March;

QQ. On or about March 3, 2021, [1] **BRANDON MILLER** purchased four handguns from Clarksville Gun & Archery, a FFL, located in Clarksville, Tennessee;

RR. On or about March 4, 2021, [1] **BRANDON MILLER** contacted [4] **BLAISE SMITH** and stated that he had just purchased multiple firearms and was out of money to purchase additional firearms at the moment;

SS. On or about March 4, 2021, [4] **BLAISE SMITH** contacted [1] **BRANDON MILLER** in order to pay for the ordered firearms. [1] **BRANDON MILLER** informed [4] **BLAISE SMITH** that the username for his CashApp account was “\$bigarsenal”. [4] **BLAISE SMITH** informed [1] **BRANDON MILLER** that he would send \$1,000 (for the purchase of the firearms) in two separate transfers of \$500 each. [1] **BRANDON MILLER**’s CashApp account with username “\$bigarsenal” received two \$500 deposits from [4] **BLAISE SMITH** that same day.

TT. On or about March 5, 2021, [6] **BRYANT LARKIN** transferred \$675 to [2] **JARIUS BRUNSON** via CashApp as payment for firearms. [2] **JARIUS BRUNSON** then purchased three firearms from Paducah Shooter's Supply Inc., a FFL, located in Paducah, Kentucky, the following day, March 6, 2021;

UU. On or about March 5, 2021, [9] **TERRELL MITCHELL** requested, via text message, that [1] **BRANDON MILLER** purchase him a Draco model firearm and advised [1] **BRANDON MILLER** that he "just put money on the card." These text messages coincide with two CashApp transfers from [9] **TERRELL MITCHELL** to [1] **BRANDON MILLER** that day for \$500 and \$1,000;

VV. On or about March 6, 2021, [9] **TERRELL MITCHELL** coordinated the purchase price of firearms with [1] **BRANDON MILLER**, which coincides with two CashApp transfers of \$300 from [9] **TERRELL MITCHELL** to [1] **BRANDON MILLER**, one on March 6, 2021, and the other on March 7, 2021;

WW. Beginning on or about the evening of March 6, 2021, and continuing through the early morning hours of March 7, 2021, [1] **BRANDON MILLER** traveled from the Middle District of Tennessee to the Chicago area for the purpose of delivering firearms to individuals living in the Chicago area, including [4] **BLAISE SMITH** and [9] **TERRELL MITCHELL**;

XX. On or about March 7, 2021, [4] **BLAISE SMITH** contacted [1] **BRANDON MILLER** and instructed him to "drop them [the firearms] off" and [1] **BRANDON MILLER** responded that he was approximately an hour away;

YY. On or about March 19, 2021, [5] **RAHEEM JOHNSON** contacted [1] **BRANDON MILLER** to coordinate the purchase and delivery of firearms from Tennessee to Chicago. [5] **RAHEEM JOHNSON** informed [1] **BRANDON MILLER** that multiple

individuals would be sending him money to purchase firearms for delivery sometime in April;

ZZ. On or about March 28, 2021, [5] RAHEEM JOHNSON contacted [1] BRANDON MILLER to coordinate the purchase and delivery of firearms from Tennessee to Chicago by informing him that “[w]e need all typa shit.” [1] BRANDON MILLER responded to [5] RAHEEM JOHNSON that the firearms would be “7-750 [dollars] a piece”;

AAA. On or about April 1, 2021, [5] RAHEEM JOHNSON asked [1] BRANDON MILLER when he would be delivering more firearms and [1] BRANDON MILLER responded, “whenever I get the rest of the units” and advised that he had already purchased the following models of Glock firearms: “19, 22, 17, [and] 26”;

BBB. On or about April 1, 2021, [1] BRANDON MILLER informed [6] BRYANT LARKIN, “I got 4 [firearms] so far and I’m still working to some more”;

CCC. On or about April 1, 2021, [1] BRANDON MILLER transferred \$1,000 to [3] DEMARCUS ADAMS, who then purchased a Glock GMBH Model 22 Gen 5 handgun bearing serial number BSLS061 and a Glock GMBH Model 19 handgun bearing serial number BTCF330 from The Shell Shop, a FFL, located in Hopkinsville, Kentucky;

DDD. On or about April 1, 2021, [1] BRANDON MILLER transferred over \$500 to [2] JARIUS BRUNSON who then purchased a Glock GMBH Model 17 handgun bearing serial number BSNE936 and a Glock GMBH Model 19 handgun bearing serial number BJCF270 from The Shell Shop, a FFL, in Hopkinsville, Kentucky;

EEE. On or about April 3, 2021, [1] BRANDON MILLER informed [6] BRYANT LARKIN that he was 90 miles away from Chicago and [6] BRYANT LARKIN told him to park in front of [6] BRYANT LARKIN’s building when he arrived;

FFF. On or about April 4, 2021, [1] BRANDON MILLER and [6] BRYANT LARKIN discussed the delivery of firearms, payment issues related to the delivery of the firearms, and what happened to Glock switches that [1] BRANDON MILLER intended to deliver with the firearms;

GGG. On or about April 15, 2021, [1] BRANDON MILLER sent [6] BRYANT LARKIN a picture via text message of firearm cases stacked up in his residence with the caption “aint even half”;

HHH. On or about April 16, 2021, [1] BRANDON MILLER sent [6] BRYANT LARKIN a text message indicating that he did not “wan[n]a hear about no mo funerals brung every heat mfs asked to keep all da guys here . . . I gave folks top picks first” and later that day indicated that he planned to deliver more firearms in “May after [] therapy”;

III. On or about April 21, 2021, [8] ELIJAH TILLMAN contacted [1] BRANDON MILLER via text message and informed him that he needed a Glock 23 and also discussed other firearms’ purchases and deliveries from [1] BRANDON MILLER, to individuals in the Chicago area;

JJJ. On or about April 25, 2021, [5] RAHEEM JOHNSON asked [1] BRANDON MILLER whether he had purchased the Glock 27 that [5] RAHEEM JOHNSON previously ordered and advised that he was sending additional funds to cover the purchase of the firearm. In response, [1] BRANDON MILLER provided his CashApp username “\$bigarsenal” to facilitate the transfer of funds and confirmed that [5] RAHEEM JOHNSON owed him \$750 for the firearms;

KKK. On or about April 27, 2021, [1] BRANDON MILLER transferred over \$1,100 to a person known to the Grand Jury who then purchased a Glock GMBH Model 20 Gen4 handgun bearing serial number BTEL971 and a Glock GMBH Model 23 handgun

bearing serial number BTAB745 from Gun & Knife Country, a FFL, located in Oak Grove, Kentucky, and provided these firearms to [1] **BRANDON MILLER**; LLL. On or about April 27, 2021, [2] **JARIUS BRUNSON**, at the direction of [1] **BRANDON MILLER**, purchased a firearm, to wit: a Glock 33, .357 caliber Pistol, Serial Number BTCN972, from Gun & Knife Country, a FFL, located in Oak Grove, Kentucky, and transferred said firearm to the possession of [1] **BRANDON MILLER** for the purpose of subsequently transferring said firearm to an individual residing outside the States of Tennessee and Kentucky;

MMM. On or about April 28, 2021, [1] **BRANDON MILLER** possessed a Glock 33, .357 caliber pistol bearing serial number BTCN972; a Glock 27Gen5 .40 caliber pistol bearing serial number BTFA977; a Glock 23 .40 caliber pistol bearing serial number BTKB361; a Glock 20gen4 10mm pistol bearing serial number BTEL971; and a Glock 27gen5 .40 caliber pistol bearing serial number BTAB745.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

(Money Laundering Conspiracy—18 U.S.C. § 1956(h))

THE GRAND JURY FURTHER CHARGES:

PURPOSE OF THE CONSPIRACY

12. The allegations contained in Paragraphs 1 through 11 are realleged and incorporated by reference as if fully set forth herein.

13. Beginning on a date unknown to the Grand Jury, but since at least in or about December 2020, and continuing through on or about April 28, 2021, in the Middle District of Tennessee and elsewhere, [1] **BRANDON MILLER**, [2] **JARIUS BRUNSON**, [3] **DEMARCUS ADAMS**, [4] **BLAISE SMITH**, [5] **RAHEEM JOHNSON**, [6] **BRYANT**

LARKIN, [7] COREY CURTIS, [8] ELIJAH TILLMAN, [9] TERRELL MITCHELL, [10] LAZARUS GREENWOOD, [11] DWIGHT LOWRY, and [12] DRESHION PARKS did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury, including KHALIEF WHITFIELD, now deceased, and DONTAE THOMAS, now deceased, to commit offenses against the United States, in violation of Title 18, United States Code, Section 1956:

A. To knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, any person who, with the intent to engage in the business of dealing in firearms and in the course of such business, to ship, transport, or receive any firearm in interstate or foreign commerce, in violation of Title 18, United States Code, Section 922(a)(1)(A), travels from any State into any other State and acquires or attempts to acquire a firearm in such other State in furtherance of such purpose, in violation of Title 18, United States Code, Section 924(n), with the intent to promote the carrying on of specified unlawful activity; and

B. To knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, any person who, with the intent to engage in the business of dealing in firearms and in the course of such business, to ship, transport, or receive any firearm in interstate or foreign commerce, in violation of section 922(a)(1)(A), travels from any State into any other State and acquires or attempts to acquire a firearm in such other State in furtherance of such purpose, in violation of Title 18, United States Code, Section 924(n), with the intent to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and

attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

MANNER AND MEANS

14. The manner and means used to accomplish the objectives of the conspiracy included:

A. [1] **BRANDON MILLER** would purchase, and would direct [2] **JARIUS BRUNSON**, [3] **DEMARCUS ADAMS**, and others known and unknown to the Grand Jury, to purchase firearms from FFLs, licensed under Chapter 44 of Title 18, United States Code, for sale to others known and unknown to the Grand Jury, including [4] **BLAISE SMITH**, [5] **RAHEEM JOHNSON**, [6] **BRYANT LARKIN**, [7] **COREY CURTIS**, [8] **ELIJAH TILLMAN**, [9] **TERRELL MITCHELL**, [10] **LAZARUS GREENWOOD**, [11] **DWIGHT LOWRY**, [12] **DRESHION PARKS**, KHALIEF WHITFIELD, now deceased, and DONTAE THOMAS, now deceased, all members of the Pocket Town Gangster Disciples street gang in Chicago, Illinois;

B. In order to avoid detection, [1] **BRANDON MILLER**, [2] **JARIUS BRUNSON**, and [3] **DEMARCUS ADAMS** would purchase firearms by falsely claiming on ATF Form 4473, the required Firearms Transaction Record, that they were the buyers and transferees of the firearms, when in fact others known and unknown to the Grand Jury, including [4] **BLAISE SMITH**, [5] **RAHEEM JOHNSON**, [6] **BRYANT LARKIN**, [7] **COREY CURTIS**, [8] **ELIJAH TILLMAN**, [9] **TERRELL MITCHELL**, [10] **LAZARUS GREENWOOD**, [11] **DWIGHT LOWRY**, [12] **DRESHION PARKS**, KHALIEF WHITFIELD, now deceased, and DONTAE THOMAS, now deceased, all

members of the Pocket Town Gangster Disciples in Chicago, Illinois, were the true buyers and transferees of the firearms;

C. [1] BRANDON MILLER, [2] JARIUS BRUNSON, [3] DEMARCUS ADAMS, [4] BLAISE SMITH, [5] RAHEEM JOHNSON, [6] BRYANT LARKIN, [7] COREY CURTIS, [8] ELIJAH TILLMAN, [9] TERRELL MITCHELL, [10] LAZARUS GREENWOOD, [11] DWIGHT LOWRY, [12] DRESHION PARKS KHALIEF WHITFIELD, now deceased, and DONTAE THOMAS, now deceased, would conduct financial transactions related to the purchase and sale of firearms through web-based applications such as CashApp and Zelle and electronic bank transfers;

D. In order to cover the cost of purchasing firearms, [4] BLAISE SMITH, [5] RAHEEM JOHNSON, [6] BRYANT LARKIN, [7] COREY CURTIS, [8] ELIJAH TILLMAN, [9] TERRELL MITCHELL, [10] LAZARUS GREENWOOD, [11] DWIGHT LOWRY, [12] DRESHION PARKS, KHALIEF WHITFIELD, now deceased, and DONTAE THOMAS, now deceased, and others known and unknown to the Grand Jury would pay money to [1] BRANDON MILLER, or to others at [1] BRANDON MILLER's direction, such as [2] JARIUS BRUNSON and [3] DEMARCUS ADAMS, through web-based applications such as CashApp and Zelle and electronic bank transfers to facilitate the purchase of the firearms;

E. [1] BRANDON MILLER would deposit money into the accounts of third parties and then have the money transferred from the third party's bank account to his account, which he would then use to purchase items as well as firearms and ammunition;

F. [1] BRANDON MILLER would provide money to [2] JARIUS BRUNSON, [3] DEMARCUS ADAMS, and others known and unknown to the Grand

Jury, either in advance of the purchase of the firearms or as a reimbursement after the purchase of the firearms; and

G. [1] BRANDON MILLER, [2] JARIUS BRUNSON, [3] DEMARCUS ADAMS, and others known and unknown to the Grand Jury, then transferred, sold, traded, gave, transported, and delivered these firearms to individuals who resided outside of the States of Tennessee and Kentucky, including in Chicago, Illinois, including [4] BLAISE SMITH, [5] RAHEEM JOHNSON, [6] BRYANT LARKIN, [7] COREY CURTIS, [8] ELIJAH TILLMAN, [9] TERRELL MITCHELL, [10] LAZARUS GREENWOOD, [11] DWIGHT LOWRY, [12] DRESHION PARKS, KHALIEF WHITFIELD, now deceased, and DONTAE THOMAS, now deceased, all members of the Pocket Town Gangster Disciples in Chicago, Illinois.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT THREE

(Conspiracy to Commit 924(c) Offenses—18 U.S.C. § 924(o))

THE GRAND JURY FURTHER CHARGES:

15. The allegations set forth in Paragraphs 1 through 14 are realleged and incorporated by reference as if fully set forth herein.

16. Beginning on a date unknown to the Grand Jury, but since at least in or about December 2020, and continuing through the present, in the Middle District of Tennessee and elsewhere, [1] BRANDON MILLER, [2] JARIUS BRUNSON, [3] DEMARCUS ADAMS, [4] BLAISE SMITH, [5] RAHEEM JOHNSON, [6] BRYANT LARKIN, [7] COREY CURTIS, [8] ELIJAH TILLMAN, [9] TERRELL MITCHELL, [10] LAZARUS GREENWOOD, [11] DWIGHT LOWRY, and [12] DRESHION PARKS did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury, including

KHALIEF WHITFIELD, now deceased, and DONTAE THOMAS, now deceased, to possess firearms in furtherance of drug trafficking crimes for which they may be prosecuted in a court of the United States, to wit, distribution of, and possession with intent to distribute, controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and to use and carry firearms during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, to wit, assault with a dangerous weapon in aid of racketeering and assault in aid of racketeering resulting in serious bodily injury, in violation of Title 18, United States Code, Section 1959(a)(3).

All in violation of Title 18, United States Code, Section 924(o).

COUNT FOUR

(Engaging in Business Without a License (Firearms)—18 U.S.C. § 922(a)(1))

THE GRAND JURY FURTHER CHARGES:

Beginning not later than in or about December 2020, the exact date being unknown to the Grand Jury, through on or about April 28, 2021, in the Middle District of Tennessee and elsewhere, **[1] BRANDON MILLER, [2] JARIUS BRUNSON, and [3] DEMARCUS ADAMS**, not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT FIVE

(False Statement During Purchase of a Firearm—18 U.S.C. § 922(a)(6))

THE GRAND JURY FURTHER CHARGES:

On or about December 28, 2020, in the Middle District of Tennessee, **[3] DEMARCUS ADAMS**, in connection with the acquisition of a firearm, to wit: a Glock 17, 9mm pistol, Serial

Number BRWA198, from Tennessee Gun Country, a FFL licensed under Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious written statement to Tennessee Gun Country, which statement was intended and likely to deceive Tennessee Gun Country, as to a fact material to the lawfulness of the sale and acquisition of said firearm to [3] **DEMARCUS ADAMS** under Chapter 44 of Title 18, United States Code, in that [3] **DEMARCUS ADAMS** falsely represented on ATF Form 4473, the Firearms Transaction Record, that [3] **DEMARCUS ADAMS** was the transferee and buyer of said firearm, when in fact, [3] **DEMARCUS ADAMS** purchased said firearm for another person.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SIX

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about December 28, 2020, and on or about March 26, 2021, in the Middle District of Tennessee and elsewhere, [1] **BRANDON MILLER** and [3] **DEMARCUS ADAMS**, not being licensed importers, manufacturers, dealers, and collectors of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Glock 17, 9mm pistol, Serial Number BRWA198, to an individual outside of the States of Tennessee and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing that said person was not then residing in the States of Tennessee and Kentucky, the States in which [1] **BRANDON MILLER** and [3] **DEMARCUS ADAMS** were residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5), 924(a)(1)(D), and 2.

COUNT SEVEN

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about January 4, 2021, and on or about February 2, 2021, in the Middle District of Tennessee and elsewhere, **[1] BRANDON MILLER**, not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Glock 23, .40 caliber Pistol, Serial Number AEKW006, to an individual outside of the States of Tennessee and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing that said person was not then residing in the States of Tennessee and Kentucky, the States in which **[1] BRANDON MILLER** was residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5) and 924(a)(1)(D).

COUNT EIGHT

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about January 8, 2021, and on or about March 26, 2021, in the Middle District of Tennessee and elsewhere, **[1] BRANDON MILLER** and **[2] JARIUS BRUNSON**, not being licensed importers, manufacturers, dealers, and collectors of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: Glock 27, .40 caliber Pistol, Serial Number BPCF675, to an individual outside of the States of Tennessee and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United

States Code, and knowing that said person was not then residing in the States of Tennessee and Kentucky, the States in which [1] **BRANDON MILLER** and [2] **JARIUS BRUNSON** were residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5), 924(a)(1)(D), and 2.

COUNT NINE

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about January 20, 2021, and on or about March 11, 2021, in the Middle District of Tennessee and elsewhere, [1] **BRANDON MILLER**, not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: Glock 23, .40 caliber Pistol, Serial Number AERW236, to an individual outside of the States of Tennessee and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing that said person was not then residing in the States of Tennessee and Kentucky, the States in which [1] **BRANDON MILLER** was residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5) and 924(a)(1)(D).

COUNT TEN

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about January 22, 2021, and on or about March 26, 2021, in the Middle District of Tennessee and elsewhere, [1] **BRANDON MILLER** and [2] **JARIUS BRUNSON**,

not being licensed importers, manufacturers, dealers, and collectors of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Glock 17, 9mm Pistol, Serial Number BRDK220, to an individual outside of the States of Tennessee and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing that said person was not then residing in the States of Tennessee and Kentucky, the States in which [1] **BRANDON MILLER** and [2] **JARIUS BRUNSON** were residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5), 924(a)(1)(D), and 2.

COUNT ELEVEN

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about January 22, 2021, and on or about April 28, 2021, in the Middle District of Tennessee and elsewhere, [1] **BRANDON MILLER**, aided and abetted by an individual known to the Grand Jury, not being licensed importers, manufacturers, dealers, and collectors of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Glock 22, .40 caliber pistol, Serial Number BSLU559, to an individual outside of the States of Tennessee and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing that said person was not then residing in the States of Tennessee and Kentucky, the States in which [1] **BRANDON MILLER** and the individual known to the Grand Jury were residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5), 924(a)(1)(D), and 2.

COUNT TWELVE

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about January 22, 2021, and on or about March 26, 2021, in the Middle District of Tennessee and elsewhere, [1] **BRANDON MILLER** and [2] **JARIUS BRUNSON**, not being licensed importers, manufacturers, dealers, and collectors of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Glock 17 Gen5, 9mm pistol, Serial Number BPKP034, to an individual outside of the States of Tennessee and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing that said person was not then residing in the States of Tennessee and Kentucky, the States in which [1] **BRANDON MILLER** and [2] **JARIUS BRUNSON** were residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5), 924(a)(1)(D), and 2.

COUNT THIRTEEN

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about February 12, 2021, and on or about March 26, 2021, in the Middle District of Tennessee and elsewhere, [1] **BRANDON MILLER**, not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: Glock 43X, 9mm Pistol, Serial Number BSDN847, to an individual outside of the States of Tennessee

and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing that said person was not then residing in the States of Tennessee and Kentucky, the States in which [1] **BRANDON MILLER** was residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5), 924(a)(1)(D), and 2.

COUNT FOURTEEN

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about February 12, 2021, and on or about April 28, 2021, in the Middle District of Tennessee and elsewhere, [1] **BRANDON MILLER**, not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Smith & Wesson SD40VE .40 caliber pistol, Serial Number FDA5336, to an individual outside of the States of Tennessee and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing that said person was not then residing in the States of Tennessee and Kentucky, the States in which [1] **BRANDON MILLER** was residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5) and 924(a)(1)(D).

COUNT FIFTEEN

(False Statement During Purchase of a Firearm—18 U.S.C. § 922(a)(6))

THE GRAND JURY FURTHER CHARGES:

On or about February 25, 2021, in the Middle District of Tennessee, [1] **BRANDON MILLER**, in connection with the acquisition of a firearm, to wit a Glock 45, 9mm pistol, Serial Number BSBC884, from Clarksville Gun & Archery, a FFL licensed under Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious written statement to Clarksville Gun & Archery, which statement was intended and likely to deceive Clarksville Gun & Archery, as to a fact material to the lawfulness of the sale and acquisition of said firearm to [1] **BRANDON MILLER** under Chapter 44 of Title 18, United States Code, in that [1] **BRANDON MILLER** falsely represented on ATF Form 4473, the Firearms Transaction Record, that [1] **BRANDON MILLER** was the transferee and buyer of said firearm, when in fact, [1] **BRANDON MILLER** purchased said firearm for another person.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SIXTEEN

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about February 27, 2021, and on or about April 28, 2021, in the Middle District of Tennessee and elsewhere, [1] **BRANDON MILLER** and [2] **JARIUS BRUNSON**, not being licensed importers, manufacturers, dealers, and collectors of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Glock 17 Gen5, 9mm Pistol, Serial Number BRNF258, to an individual outside of the States of Tennessee and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United

States Code, and knowing that said person was not then residing in the States of Tennessee and Kentucky, the States in which [1] BRANDON MILLER and [2] JARIUS BRUNSON were residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5), 924(a)(1)(D), and 2.

COUNT SEVENTEEN

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about March 5, 2021, and on or about April 28, 2021, in the Middle District of Tennessee and elsewhere, [1] BRANDON MILLER and [2] JARIUS BRUNSON, not being licensed importers, manufacturers, dealers, and collectors of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Glock 19, 9mm pistol, Serial Number BSCB342, to an individual outside of the States of Tennessee and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing that said person was not then residing in the States of Tennessee and Kentucky, the States in which [1] BRANDON MILLER and [2] JARIUS BRUNSON were residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5), 924(a)(1)(D), and 2.

COUNT EIGHTEEN

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about March 6, 2021, and on or about April 28, 2021, in the Middle District of Tennessee and elsewhere, [1] BRANDON MILLER and [2] JARIUS BRUNSON, not being

licensed importers, manufacturers, dealers, and collectors of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Pioneer Arms Corp. Hellpup AKM-47 7.62 mm pistol, Serial Number PAC1145824, to an individual outside of the States of Tennessee and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing that said person was not then residing in the States of Tennessee and Kentucky, the States in which [1] **BRANDON MILLER** and [2] **JARIUS BRUNSON** were residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5), 924(a)(1)(D), and 2.

COUNT NINETEEN

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about March 13, 2021, and on or about April 28, 2021, in the Middle District of Tennessee and elsewhere, [1] **BRANDON MILLER**, not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Smith & Wesson M&P .45 caliber pistol, Serial Number HTL1203, to an individual outside of the States of Tennessee and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing that said person was not then residing in the States of Tennessee and Kentucky, the States in which [1] **BRANDON MILLER** was residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5) and 924(a)(1)(D).

COUNT TWENTY

(False Statement During Purchase of a Firearm—18 U.S.C. § 922(a)(6))

THE GRAND JURY FURTHER CHARGES:

On or about April 1, 2021, in the Middle District of Tennessee, [1] **BRANDON MILLER**, in connection with the acquisition of a firearm, to wit a Glock 17, 9mm pistol, Serial Number AFKD437, from Clarksville Gun & Archery, a FFL licensed under Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious written statement to Clarksville Gun & Archery, which statement was intended and likely to deceive Clarksville Gun & Archery, as to a fact material to the lawfulness of the sale and acquisition of said firearm to [1] **BRANDON MILLER** under Chapter 44 of Title 18, United States Code, in that [1] **BRANDON MILLER** falsely represented on ATF Form 4473, the Firearms Transaction Record, that [1] **BRANDON MILLER** was the transferee and buyer of said firearm, when in fact, [1] **BRANDON MILLER** purchased said firearm for another person.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWENTY-ONE

(Transferring a Firearm to an Out-of-State Resident—18 U.S.C. § 922(a)(5))

THE GRAND JURY FURTHER CHARGES:

Between on or about April 1, 2021, and on or about April 28, 2021, in the Middle District of Tennessee and elsewhere, [1] **BRANDON MILLER**, not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Glock 17, 9mm pistol, Serial Number AFKD437, to an individual outside of the States of Tennessee and Kentucky who was not a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing that said person was not

then residing in the States of Tennessee and Kentucky, the States in which [1] BRANDON MILLER was residing at the time of the aforesaid transfer, sale, trade, giving, transportation, or delivery of said firearm.

In violation of Title 18, United States Code, Sections 922(a)(5) and 924(a)(1)(D).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are re-alleged and incorporated by reference as if fully set forth in support of this forfeiture.

2. Upon conviction of any one of Counts One and Three through Twenty-One, [1] BRANDON MILLER, [2] JARIUS BRUNSON, [3] DEMARCUS ADAMS, [4] BLAISE SMITH, [5] RAHEEM JOHNSON, [6] BRYANT LARKIN, [7] COREY CURTIS, [8] ELIJAH TILLMAN, [9] TERRELL MITCHELL, [10] LAZARUS GREENWOOD, [11] DWIGHT LOWRY, and [12] DRESHION PARKS shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) by Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in a knowing violation of Title 18, United States Code, Section 922, including the firearms and ammunition listed below:

- a. a Glock 17, 9mm pistol, Serial Number BRWA198;
- b. a Glock 23, .40 caliber pistol, Serial Number AEKW006;
- c. a Glock 27, .40 caliber pistol, Serial Number BPCF675;
- d. a Glock 21, .45 caliber pistol, Serial Number AERW263;
- e. a Glock 17, 9mm pistol, Serial Number BRDK220;
- f. a Glock 43X, 9mm pistol, Serial Number BSDN847;
- g. a Glock 33, .357 caliber pistol, Serial Number BTCN972;
- h. a Smith & Wesson SD40VE .40 caliber pistol, Serial Number FDA5336;
- i. a Smith & Wesson M&P .45 caliber pistol, Serial Number HTL1203;

- j. a Glock 45, 9mm pistol, Serial Number BSBC884;
- k. a Glock 17, 9mm pistol, Serial Number AFKD437;
- l. a Glock 27 Gen5, .40 caliber pistol, Serial Number BTFA977;
- m. a Glock 23, .40 caliber pistol, Serial Number BTKB361;
- n. a Glock 19, 9mm pistol, Serial Number BSCB342;
- o. a Glock 26 Gen5, 9mm pistol, Serial Number ADRA567;
- p. a Glock 17 Gen5, 9mm pistol, Serial Number BPKP034;
- q. a Glock 17 Gen5, 9mm Pistol, Serial Number BRNF258;
- r. a Pioneer Arms Corp. Hellpup AKM-47 7.62 mm pistol, Serial Number PAC1145824;
- s. a Glock 27 Gen5, .40 caliber pistol, Serial Number BTAB745;
- t. a Glock 20 Gen4, 10 mm pistol, Serial Number BTEL971; and
- u. a Glock 22, .40 caliber pistol, Serial Number BSLU559.

A TRUE BILL
[Redacted]
FOREPERSON

MARK H. WILDASIN
UNITED STATES ATTORNEY


JOSHUA A. KURTZMAN
KATHRYN RISINGER
ASSISTANT UNITED STATES ATTORNEYS